REMARKS/ARGUMENTS

Claims 1-24 are pending. In the previous Office Action, claims 1-9, 11-19, 21-24 were rejected under 35 U.S.C. 103(a) as being unpatentable over Chase (7,092,389) in view of Havala (US 2005/0053079). In light of Applicant remarks in the previous Office Action Response, the Examiner is now rejecting the claims under new grounds. Claims 1-8, 11-18, 21-22, 23-24 are rejected under 35 U.S.C. 103(a) as being unpatentable over Chase in view of Kuhl (7,257,121).

Chase states "As seen in FIG. 5, each of premises 16000.sub.1, 16000.sub.2 and 16000.sub.3 belonging to customer 1, customer 2 and customer 3, respectively, may send frames for receipt at MSP 12000.sub.2 in the MAN 10000. The MSP 12000.sub.2 tags each frame with the corresponding customer descriptor prior to statistically multiplexing the data for transmission on the fiber ring infrastructure 14 to the CO MSP 12000.sub.4 for receipt at the ATM switch 30. The ATM switch 30 then maps each frame to the appropriate PVC in accordance with the customer descriptor 22' in the frame in a manner similar to the mapping described with respect to FIG. 3." (Figure 5 Description)

Kuhl states "In direction 246, for traffic bound for ATM network 102, MPLS card 204 receives MPLS frames transmitted from MPLS network 104 and converts them into internal cells. Fabric card 202 receives internal cells transmitted from MPLS card 204 and transmits them to the appropriate ATM card 200. ATM card 200 converts internal cells into ATM cells and transmits them over ATM network 102 to their destination. Referring to FIG. 3, aspects of the conversion of ATM cells received by ATM/MPLS edge switch 122(1) to MPLS frames, and vice versa are shown." (Figure 2 Description)

The Examiner relies on Chase to describe a first plurality of inner tag values describing services and a second plurality of inner tag values describing services. The Examiner appears to be arguing that a VLAN priority and a VLAN ID together are an inner tag value. However, there is no first plurality of inner tag values that identify a service where a second plurality of inner tag values identify subnetworks. Nonetheless, the independent claims have been amended to facilitate prosecution.

The independent claims have been amended to recite "wherein a first value for the inner tag field is mapped to a frame relay service, a second value for the inner tag field is mapped to an

Application No.: 10/664,591 6

Ethernet service, and a plurality of values for the inner tag field are mapped to Asynchronous

Transfer Mode (ATM) virtual circuits." This amendment is supported throughout the

Specification and Drawings. For example, "An inner tag value 2801 is mapped to an Internet

service. An inner tag value 2802 is mapped to a frame relay service. An inner tag 2803 is

mapped to a distant Metro Ethernet service. When a service mapping bridge receives an outer

tag and an inner tag frame, it can reference the outer tag to locate an inner tag table. The inner

tag table can then be referenced by the bridge to determine what services the outer and inner tag

frame should be mapped to."

The material in Chase only describes a VLAN priority and a VLAN ID. None of the

materials cited by the Examiner either alone or in combination teach or suggest mapping of

values for the first inner tag field to an Ethernet service, a frame relay service, and to a plurality

of virtual circuits.

In light of the above remarks, the rejections to the independent claims are believed

overcome for at least the reasons noted above. Applicants believe that all pending claims are

allowable in their present form. Please feel free to contact the undersigned at the number

provided below if there are any questions, concerns, or remaining issues.

Respectfully submitted,

Weaver Austin Villeneuve & Sampson LLP

/Audrey Kwan/

G. Audrey Kwan

Reg. No. 46,850

P.O. Box 70250

Oakland, CA 94612-0250

(510) 663-1100

Application No.: 10/664,591

7